

Paul P. Eyre  
Ernest E. Vargo  
Michael E. Mumford  
Erin K. Murdock-Park  
BAKER & HOSTETLER LLP  
PNC Center  
1900 East Ninth Street, Suite 3200  
Cleveland, Ohio 44114-3482  
Telephone: 216.621.0200  
Facsimile: 216.696.0740  
peyre@bakerlaw.com  
evargo@bakerlaw.com  
mmumford@bakerlaw.com  
emurdockpark@bakerlaw.com

Tracy L. Cole  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4210  
Facsimile: (212) 589-4201  
tcole@bakerlaw.com

Attorneys for Defendants Mitsui & Co. (Taiwan),  
Ltd. and Mitsui & Co. (U.S.A.), Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

This Document Relates to Individual Case  
No. 3:11-cv-03856-SI

Case No. 3:11-cv-03856-SI

Master File No. 3:07-md-1827-SI

MDL No. 1827

SCHULTZE AGENCY SERVICES, LLC  
ON BEHALF OF TWEETER OPCO, LLC  
AND TWEETER NEWCO, LLC

Plaintiff,

v.

AU OPTRONICS CORPORATION, et al.,

Defendants.

STIPULATION OF EXTENSION OF TIME  
FOR DEFENDANTS MITSUI & CO.  
(TAIWAN), LTD. AND MITSUI & CO.  
(U.S.A.), INC. TO RESPOND TO THE  
FIRST AMENDED COMPLAINT AND  
[PROPOSED] ORDER

**Clerk's Action Required**

1 WHEREAS, plaintiff Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC  
2 and Tweeter Newco, LLC (“Tweeter”) filed a Complaint in the above-captioned action against  
3 defendants Mitsui & Co. (Taiwan), Ltd. (“Mitsui Taiwan”) and Mitsui & Co. (U.S.A.), Inc.  
4 (“Mitsui USA”), among other defendants, on July 1, 2011.

5 WHEREAS, Tweeter, Mitsui Taiwan and Mitsui USA, among other defendants  
6 previously entered into a stipulation giving Tweeter until December 6, 2011 to file a First  
7 Amended Complaint, and giving Mitsui Taiwan and Mitsui USA until January 10, 2012 to move  
8 to dismiss, answer or otherwise respond to the First Amended Complaint, (*See* Dkt. #22; MDL  
9 Dkt. #4087.)

10 WHEREAS, on December 1, 2011, Mitsui Taiwan intends to move to dismiss in the  
11 amended complaint in the related case of *Electrograph Systems, Inc., et al. v. Epson Imaging*  
12 *Devices Corp., et al.*, Individual Docket No. 3:10-cv-00117-SI (N.D. Cal.), Master Docket No.  
13 3:07-md-01827-SI (N.D. Cal.) on the grounds that the Court lacks personal jurisdiction over  
14 Mitsui Taiwan.

15 WHEREAS, Mitsui Taiwan and Mitsui USA also intend to raise lack of personal  
16 jurisdiction as a defense in the instant case.

17 WHEREAS, the Court’s ruling on Mitsui Taiwan’s motion to dismiss in *Electrograph*  
18 may be relevant to the issue of personal jurisdiction in the instant case.

19 WHEREAS, in the interests of efficiency and judicial economy, Tweeter, Mitsui Taiwan  
20 and Mitsui USA have reached an agreement, pursuant to Civil Rule L.R. 6-1(a), that Mitsui  
21 Taiwan and Mitsui USA shall have an extension of time until twenty-one (21) days after the  
22 Court rules on Mitsui Taiwan’s motion to dismiss in *Electrograph*, in which to move against,  
23 answer, or otherwise respond to Tweeter’s First Amended Complaint.

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the  
25 undersigned counsel, on behalf of their respective clients, Tweeter on the one hand, and Mitsui  
26 Taiwan and Mitsui USA, on the other hand, that Mitsui Taiwan and Mitsui USA’s deadline to  
27 move to dismiss, answer, or otherwise respond to the First Amended Complaint will be twenty-  
28

one (21) days after the Court issues its order on Mitsui Taiwan's motion to dismiss the amended complaint in *Electrograph*.

Dated: November 29, 2011

By: /s/ Michael E. Mumford  
Paul P. Eyre  
Ernest E. Vargo  
Michael E. Mumford  
Erin K. Murdock-Park  
BAKER & HOSTETLER LLP  
PNC Center  
1900 East Ninth Street, Suite 3200  
Cleveland, Ohio 44114-3482  
(216) 621-0200 (Phone)  
(216) 696-0740 (Facsimile)  
*peyre@bakerlaw.com*  
*evargo@bakerlaw.com*  
*mmumford@bakerlaw.com*  
*emurdockpark@bakerlaw.com*

Tracy L. Cole  
BAKER & HOSTETLER LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4210  
Facsimile: (212) 589-4201  
*tcole@bakerlaw.com*

*Counsel for Defendants Mitsui & Co. (Taiwan), Ltd.  
and Mitsui & Co. (U.S.A), Inc.*

By: /s/ Philip J. Iovieno  
Philip J. Iovieno  
BOIES, SCHILLER & FLEXNER LLP  
10 North Pearl Street, 4th Floor  
Albany, NY 12207  
(518) 434-0600 (Phone)  
(518) 434-0665 (Facsimile)  
*piovieno@bsflp.com*

*Counsel for Schultze Agency Services, LLC  
on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC*

1 Attestation: The filer of this document attests that the concurrence of the other signatories  
2 thereto has been obtained.

3 **[PROPOSED] ORDER**

4 IT IS SO ORDERED.

5 DATED this 30<sup>th</sup> day of Nov, 2011.

6  
7 By:   
8 Hon. SUSAN ILLSTON